

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARTHUR PERRAULT,

Defendant.

Cr. No. 17-2558 MV

UNITED STATES' PROPOSED WITNESS LIST

The United States respectfully submits this Proposed Witness List. The United States reserves the right to call additional custodians of records as necessary, to call any witness named by the defense, and to amend its witness list as necessary before and during trial. Witnesses who may testify during the United States' case-in-chief include:

Name	Title	Relevance to Case	Estimated time of Testimony
Edward Blea	Former Deacon, St. Bernadette's Parish	Evidence of interaction with Defendant at time of charged offenses	30 minutes
Benedict Bourgeois	Special Agent, Federal Bureau of Investigation	Seizure of evidence from Defendant and post-arrest interview	1 hour
Victoria Bratton	Former Air National Guard member, Kirtland Air Force Base	Knew Defendant when he was chaplain at Kirtland Air Force Base, the location of several charged offenses	30 minutes
TBA	Custodian of Records – Archdiocese of Santa Fe	Authentication of Church records pertaining to Defendant	15 minutes
TBA	Custodian of Records – Second Judicial	Authentication of Court records	15 minutes

	District Court of New Mexico	pertaining to Defendant	
John Doe 1	Victim	Sexually abused by Defendant ¹	8 hours
John Doe 2	Victim	Sexually abused by Defendant	2 hours
John Doe 3	Victim	Sexually abused by Defendant	2 hours
John Doe 4	Victim	Sexually abused by Defendant	2 hours
John Doe 5	Victim	Sexually abused by Defendant	2 hours
John Doe 6	Victim	Sexually abused by Defendant	2 hours
John Doe 7	Victim	Sexually abused by Defendant	2 hours
John Doe 8	Victim	Sexually abused by Defendant	2 hours
John Doe 9	Victim	Sexually abused by Defendant	2 hours
Gail Goodman	Forensic psychologist	Testimony about delayed disclosure by child sexual abuse victims and other relevant matters	8 hours
Merrica Heaton	United States Department of State	Testimony about incriminating statements by Defendant	30 minutes
Mother of John Doe 3	Victim's mother	Testimony about incriminating statements by Defendant	1 hour
Mother of John Doe 5 and 6	Victim's mother	Testimony about incriminating statements by Defendant	1 hour
Cristina Sandoval	Special Agent, Federal Bureau of Investigation	Seizure of evidence from Defendant	30 minutes

¹ Further details of the anticipated testimony from John Doe 1-9 are set forth in Doc. 43, the United States' amended notice of offer evidence pursuant to Fed. R. Crim. P. 413, 414, and 404(b).

Cheryl Tuttle	Former Air National Guard member, Kirtland Air Force Base	Knew Defendant when he was chaplain at Kirtland Air Force Base, the location of several charged offenses	30 minutes
TBA	Kirtland Air Force Base	Testimony of land status within special maritime and territorial jurisdiction of the United States ²	30 minutes
TBA	Santa Fe National Cemetery	Testimony of land status within special maritime and territorial jurisdiction of the United States	30 minutes

Respectfully submitted,

JOHN C. ANDERSON
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/s
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I hereby certify that a copy of this motion was delivered via CM/ECF to counsel for defendants.

filed electronically

Sean J. Sullivan

² As stated in the United States' motion for a pretrial ruling on special maritime and territorial jurisdiction, Doc. 76-1, the prosecution does not believe witnesses to the land status of Kirtland Air Force Base and Santa Fe National Cemetery are necessary under the law. However, the United States is prepared to call such witnesses if the Court requires their testimony to prove the offenses occurred with the special maritime and territorial jurisdiction of the United States.